



Hamilton Square 600 14th Street NW Suite 750 Washington DC 20005
T> 202-220-0400 F > 202-220-0401

September 18, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Federal-State Joint Board on Universal Service, WC Docket No. 96-45

Dear Ms. Dortch:

On September 17, 2002, the undersigned, together with Jason Oxman of Covad Communications Company, made an *ex parte* presentation in the above-referenced docket to Commission staff. The following Commission staff members were present: Eric Einhorn, Diane Law Hsu, and Paul Garnett.

The purpose of the presentation was to discuss the proposals before the Commission to alter the methodology by which contributions to the federal universal service fund are assessed. Specifically, Covad discussed the potential negative effects of service-specific and bandwidth-tiered assessment methodologies on the innovative development of high-speed service offerings. Covad also discussed the benefits of a collect-and-remit system of contribution assessment over the current system. In particular, Covad supports the view that collect-and-remit will help avoid unfairly penalizing contributors experiencing high levels of uncollectibles with a disproportionate share of universal service contributions.

Respectfully submitted,

/s/ Praveen Goyal

Praveen Goyal
Senior Counsel for Government &
Regulatory Affairs
Covad Communications Company
600 14th Street, N.W., Suite 750
Washington, D.C. 20005
202-220-0400
202-220-0401 (fax)
pgoyal@covad.com